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15 \* Pro hac vice application to be filed

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 ROTHSCCHILD BROADCAST  
20 DISTRIBUTION SYSTEMS, LLC,

21 Plaintiff,

22 v.

23 SAMSARA, INC.,

24 Defendant.

Case No. 3:22-cv-08297-VC

**DEFENDANT SAMSARA INC.'S  
RESPONSE TO PLAINTIFF'S  
REQUEST TO REINSTATE CASE**

Judge: Hon. Vince Chhabria

1 Defendant Samsara Inc. (“Samsara”) respectfully submits its response to the Request to  
 2 Reinstate Case (Dkt. No. 18) filed by Plaintiff Rothschild Broadcast Distribution Systems, LLC  
 3 (“Rothschild”) on June 5, 2023. Rather than reinstating the case, Samsara respectfully requests that  
 4 the case stay dismissed and that the Court extend the deadline by which the parties can request to  
 5 reopen the action (Dkt. No. 16) a further 21 days. As Rothschild notes in its Request, “[t]he parties  
 6 have not yet finalized and executed a settlement agreement, but expect to do so within the next 21  
 7 days.” Dkt. No. 18. Accordingly, extending the deadline by which the parties can request to reopen  
 8 the action while keeping the case dismissed best preserves the Court’s resources with no prejudice  
 9 to any party.

10 The parties have been working diligently to finalize a definitive settlement agreement and  
 11 neither side has delayed unduly in attempting to resolve the case. The Court entered its Order of  
 12 Dismissal on April 5, 2023. Dkt. No. 16. On April 16, 2023, Samsara provided its proposed  
 13 modifications to a draft settlement agreement provided by Rothschild. The parties spoke on April  
 14 28, 2023 in an effort to resolve the outstanding differences in the draft settlement agreement. On  
 15 May 23, 2023, Rothschild provided a further revised draft settlement agreement to which Samsara  
 16 responded on June 2, 2023. Rothschild filed its Request to Reinstate the Case on June 5, 2023.

17 Dated: June 6, 2023

Respectfully submitted,

19 By: /s/ Andrew S. Ong

20 Andrew S. Ong

21 Srikanth Reddy

GOODWIN PROCTER LLP

*Attorneys for Defendant Samsara Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on June 6, 2023. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on June 6, 2023 in San Francisco, California.

/s/ Andrew S. Ong  
Andrew S. Ong